

**Remarks****I. Administrative Overview**

Claims 1-40 were previously presented. Claims 1-40 are hereby amended. Upon entry of the present amendments, Claims 1-40 are pending. No new matter has been introduced.

The Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

**II. Rejections under 35 U.S.C. § 103(a)****Claims 1, 5, 8-11, 16-18, 20, 22-24 and 27**

Claims 1, 5, 8-11, 16-18, 20 and 22-24 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over U.S. Patent Publication Number 2004/0100651 A1 to Leone (“Leone”) in view of U.S. Patent Publication Number 2003/0014368 to Leurig (“Leurig”) and in further view of U.S. Patent Number 7,142,333 to Struble (“Struble”). Applicant respectfully contends that Claims 1, 5, 8-11, 16-18, 20 and 22-24 as previously presented are patentable over Leone in view of Leurig and in further view of Struble. Nevertheless, Claims 1, 5, 8-11, 16-18, 20, 22-24 and 27 have been amended to more clearly recite the claimed invention. Thus, Applicant respectfully submits that Claims 1, 5, 8-11, 16-18, 20, 22-24 and 27, as amended, are patentable over Leone in view of Leurig and in further view of Struble.

Obviousness is shown when one or more references, alone or in combination, teach or suggest each and every element of the claimed invention. Applicant respectfully submits that any combination of Leone, Leurig and Struble fails to teach or suggest each and every element of the claimed invention.

Leone fails to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Leone describes a system for remote printing where a single print proxy accepts a data stream and transmits the data stream to a remote printer. *See* Leone, paragraph 31. Leone does not teach or even suggest multiple proxy applications much less selecting a proxy application from a plurality of proxy applications. Thus, Leone fails to teach or suggest each and every limitation of independent Claims 1, 17, 24 and 27.

Leurig and Struble, like Leone, fail to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Leurig describes a system for printing negotiable instruments and fails to teach or even suggest the use of a proxy application. Similarly, Struble describes a system for sending an electronic document to a document-based imaging system and fails to teach or even suggest the use of a proxy application. Thus, Leurig and Struble fail to teach or suggest each and every limitation of independent Claims 1, 17, 24 and 27.

For the above mentioned reasons, Claims 1, 17, 24 and 27 are patentable over any combination of Leone, Leurig and Struble. Claims 5, 8-11, 16, 18, 20 and 22-23 are also patentable over any combination of Leone, Leurig and Struble, because Claims 5, 8-11, 16, 18, 20 and 22-23 depend on Claims 1, 17 and 24.

#### Claims 2 and 25

Claims 2 and 25 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over Leone in view of Leurig in further view of Struble and in still further view of U.S. Patent Number 6,654,784 to Wei (“Wei”). Claims 2 and 25 depend on and incorporate all of the patentable subject matter of independent Claims 1 and 24. Applicant respectfully traverses this rejection and submits that any combination of Leone, Leurig, Struble and Wei fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1 and 24 over Leone, Leurig and Struble is argued above. These arguments are reiterated here and set forth in full. Like Leone, Leurig and Struble, Wei also fails to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Therefore, Wei fails to detract from the patentability of dependent Claims 2 and 25. Accordingly Claims 2 and 25 are patentable over any combination of Leone, Leurig, Struble and Wei.

#### Claims 3, 4, 19, 26-29, 32-35 and 40

Claims 3, 4, 19, 26-29, 32-35 and 40 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over Leone in view of Leurig in further view of Struble and in still further view of Admitted Prior Art (“APA”). Claims 3, 4, 19, 26, 28-29, 32-35 and 40 depend on and incorporate all the patentable subject matter of independent Claims 1, 17, 24 and 27. Applicant

respectfully traverses this rejection and submits that any combination of Leone, Leurig, Struble and APA fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1, 17, 24 and 27 over Leone, Leurig and Struble is argued above. These arguments are reiterated here and set forth in full. Like Leone, Leurig and Struble, APA also fails to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Therefore, APA fails to detract from the patentability of dependent Claims 3, 4, 19, 26, 28-29, 32-35 and 40. Accordingly Claims 3, 4, 19, 26, 28-29, 32-35 and 40 are patentable over any combination of Leone, Leurig, Struble and APA.

Claims 6, 7 and 30-31

Claims 6, 7 and 30-31 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over Leone in view of Leurig in further view of Struble and in still further view of U.S. Patent Number 7,095,905 to Peterson (“Peterson”). Claims 6, 7 and 30-31 depend on and incorporate all the patentable subject matter of independent Claims 1, 17, 24 and 27. Applicant respectfully traverses this rejection and submits that any combination of Leone, Leurig, Struble and Peterson fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1, 17, 24 and 27 over Leone, Leurig and Struble is argued above. These arguments are reiterated here and set forth in full. Like Leone, Leurig and Struble, Peterson also fails to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Therefore, Peterson fails to detract from the patentability of dependent Claims 6, 7 and 30-31. Accordingly Claims 6, 7 and 30-31 are patentable over any combination of Leone, Leurig, Struble and Peterson.

Claims 12-15 and 21

Claims 12-15 and 21 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over Leone in view of Leurig in further view of Struble and in still further view of U.S. Patent Number 5,267,051 to Dellert (“Dellert”). Claims 12-15 and 21 depend on and incorporate all the patentable subject matter of independent Claims 1 and 17. Applicant respectfully traverses this

rejection and submits that any combination of Leone, Leurig, Struble and Dellert fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1, 17, 24 and 27 over Leone, Leurig and Struble is argued above. These arguments are reiterated here and set forth in full. Like Leone, Leurig and Struble, Dellert also fails to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Therefore, Dellert fails to detract from the patentability of dependent Claims 12-15 and 21. Accordingly Claims 12-15 and 21 are patentable over any combination of Leone, Leurig, Struble and Dellert.

### Claims 36-39

Claims 36-39 are rejected under 35 U.S.C. § 103 (a) as being un-patentable over Leone in view of Leurig in further view of Struble and in still further view of APA in view of Dellert. Claims 36-39 depend on and incorporate all the patentable subject matter of independent Claim 27. Applicant respectfully traverses this rejection and submits that any combination of Leone, Leurig, Struble, APA and Dellert fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1, 17, 24 and 27 over Leone, Leurig and Struble is argued above. These arguments are reiterated here and set forth in full. Like Leone, Leurig and Struble, APA and Dellert also fail to teach or suggest selecting a proxy application from a plurality of proxy applications executing on a client as required by independent Claims 1, 17, 24 and 27. Therefore, APA and Dellert fail to detract from the patentability of dependent Claims 36-39. Accordingly Claims 36-39 are patentable over any combination of Leone, Leurig, Struble, APA and Dellert.

For the above-mentioned reasons, Applicant respectfully requests the Examiner to withdraw all rejections made under 35 U.S.C. § 103(a)

### **III. Conclusion**

Applicant contends that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicant

respectfully requests reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicant's agent would expedite prosecution of this application; the Examiner is urged to contact the Applicant's agent at the telephone number identified below.

Respectfully submitted,  
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